

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JENNINGS, et al.	:	
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	CIVIL ACTION NO. 5:21-CV-05400
CARVANA, LLC,	:	
	:	
Defendant.	:	
	:	
HARVIN, et al.	:	
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	CIVIL ACTION NO. 2:23-CV-02068
CARVANA, LLC, et al.,	:	
	:	
Defendants.	:	
	:	

DEFENDANTS' MOTION FOR PROTECTIVE ORDER

Defendants, by and through their undersigned counsel, hereby move for a protective order relating to several pending nonparty subpoenas served by Plaintiffs that seek, among other things, documents, information, or testimony relating to (1) vehicles sold by Carvana to individuals who are not putative class members because they reside outside the Commonwealth of Pennsylvania, and (2) vehicles sold by Carvana on or after November 8, 2022 to individuals whose claims would be subject to mandatory individual arbitration. This motion is supported by the memorandum of law and Declaration of Bryan Iams, submitted herewith.

Respectfully submitted,

Date: May 22, 2025

/s/ Thomas F. Burke
Daniel JT McKenna (PA ID 93930)
Thomas F. Burke (PA ID 320311)
Katherine L. Oaks (PA ID 321500)
BALLARD SPAHR LLP
1735 Market Street, 51st Floor

Philadelphia, PA 19103
Phone: (215) 665-8500
Facsimile: (215) 864-8999
mckennad@ballardspahr.com
burket@ballardspahr.com
oaksk@ballardspahr.com

Counsel for Defendants

CERTIFICATE OF SERVICE

I, Thomas F. Burke, hereby certify that I caused a copy of the foregoing Motion for Protective Order, along with the supporting memorandum of law and a copy of all declarations and exhibits, to be served on all parties, via the Court's ECF system, on May 22, 2025.

Dated: May 22, 2025

/s/ Thomas F. Burke

Thomas F. Burke